



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

0000007

MAY 28 1999

EPA Region 5 Records Ctr.



246953

REPLY TO THE ATTENTION OF

SE-5J

MEMORANDUM

SUBJECT: ACTION MEMORANDUM - Request for a Time-Critical Removal Action at the Quality Cleaners Site, Belleville, St. Clair County, Illinois (Site ID #B597)

FROM: *Kevin R. Turner* Kevin R. Turner, On-Scene Coordinator
Emergency Response Branch - Section 2

TO: William E. Muno, Director
Superfund Division

THRU: Rick Karl, Chief *Thomas J. Hershbach*
Emergency Response Branch

I. PURPOSE

The purpose of this memorandum is to request and document your approval to expend up to \$30,461.00 in order to mitigate threats to public health, welfare and the environment at the Quality Cleaners Site located at 405 North Illinois Street, Belleville, Illinois 62220. This action is necessary to mitigate the immediate threat to public health and the environment posed by the presence of uncontrolled hazardous wastes and substances on site, including drums and waste containers containing tetrachlorethene, xylene, toluene and lead.

The response action proposed herein will mitigate site conditions by removal and off-site disposal of the liquid hazardous waste and substances, above ground storage tank, and underground storage tanks and contaminated soil. The high concentrations of VOCs and heavy metals, the abandoned or discarded nature of the drums containing hazardous wastes and substances, the unrestricted access to the property, and the site's proximity to residential areas requires that this action be classified as a time critical removal. The project will require an estimated 10 working days to complete.

There are no nationally significant or precedent setting issues associated with the Quality Cleaners Site. The Quality Cleaners Site is not on the National Priorities List (NPL).

II. SITE CONDITIONS AND BACKGROUND

CERCLIS ID# ILSFN0507805

A. Physical Location and Site Description

The site is located at 405 North Illinois Street in Belleville, St. Clair County, Illinois; Latitude: 38° 31' 03.20 and Longitude: 89° 59' 04.40 (Figure 1). The site is an abandoned dry-cleaning facility. The site is situated in a commercial and residential area in downtown Belleville. Access to the site is unrestricted and vandalism is evident.

According to the Region 5 Superfund Environmental Justice Analysis, the group of residents closest to the site reside in census tract 5017, Block Group 2. This block group has a total population of 241. Of the 241, 86% are classified as white and 14% are classified as minority. Approximately 48% of the families residing in this block group have an income of less than the established state low-income level. Therefore, these demographic conditions indicate this is not an environmental justice priority for the community around this site.

B. Site Background

The Quality Cleaners site began operations in 1947. The business had a series of owners and/or operators until September 1996. In September 1996, the doors were locked, the working equipment removed and the building abandoned. The City of Belleville holds two liens on the property, one for sewerage and trash services, and another for a fire inspection. In November 1997, the St. Clair County Trustee purchased the taxes, but the property did not go to a tax deed.

On October 16, 1998, the Chief of the Belleville Fire Department, contacted Illinois EPA requesting its assistance with this property. The Fire Department's concern was the unknown chemicals outside and inside the building and potential for fire and other vandalism. In a letter dated November 23, 1998, Illinois EPA requested U.S. EPA, Region V's assistance with the Quality Cleaners site. On December 17, 1998, U.S. EPA's On-Scene Coordinator (OSC), Kevin Turner and U.S. EPA's Superfund Technical Assessment and Response Team (START), and representatives from the Belleville Fire Department, conducted a site tour and site assessment. During the site assessment, the OSC and START observed several 15 gallon and 55 gallon drums full of liquids which were easily accessible to trespassers who may have gained access to the property and entry into the building.

Four liquid samples were collected from drum material located on-site. The results of this sampling are detailed in Section III below.

The proposed cleanup activities in this Action Memorandum have been discussed with Tom Miller of the Illinois EPA's Collinsville, IL, office.

III. THREATS TO PUBLIC HEALTH, WELFARE, OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

The conditions at the Quality Cleaners site present an imminent and substantial threat to the public health, or welfare, and the environment and meet the criteria for a removal action provided for in the National Contingency Plan (NCP), Section 300.415, Paragraph (b)(2). 40 C.F.R. § 300.415(b)(2)(I), (iii) and (v), respectively, specifically allows removal actions for:

- 1) Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants;**

Analytical results from the liquid sample SO-1 contained tetrachloroethylene at a concentration of 11,000 mg/kg. Analytical results from the liquid sample SO-4, taken from the open drum containing oil and water contained lead at a concentration of 238 mg/kg. Hazardous waste toxicity characteristics based on toxicity characteristic leaching procedure concentrations (TCLP) are provided in 40 C.F.R. § 261.24. A TCLP concentration of 0.7 milligram per liter (mg/L) for tetrachloroethylene and 5.0 mg/L for lead are limiting concentrations above which a material will be classified as having hazardous characteristics. Since liquids have 100% leaching characteristics, the non-TCLP concentrations of tetrachloroethylene at 11,000 mg/kg and lead at 238 mg/kg encountered in drums samples, pose potential TCLP concentrations that exceed regulatory limits.

- 2) Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that may pose a threat of release;**

Those hazardous substances described above in drums have a potential for release should further vandalism result in these drums being disturbed. In addition, there are two underground storage tanks and one aboveground storage tank with suspected residual contents and fumes of Stoddard Solution containing tetrachloroethylene. Access to the site is unrestricted and vandalism is evident at the site.

- 3) Threat of fire or explosion;**

Analytical results from the liquid sample SO-1, taken from one of the two drums labeled "360-Solvent," had a flashpoint of 124°F. The flashpoint of sample SO-1 is such that it exhibits the RCRA hazardous waste characteristics of ignitability as defined in 40 C.F.R. § 261.21. These drums pose a potential treat of fire or explosion during hot, dry conditions.

- 4) The availability of other appropriate federal or state response mechanisms to respond to the release.**

In a letter dated November 23, 1998, Illinois EPA requested U.S. EPA, Region 4's assistance with the Quality Cleaners site. The City of Belleville has also indicated its desire to have the

unknown drummed liquids removed from this property. Neither the State of Illinois nor the City of Belleville has the funds to undertake removal of the hazardous wastes found at this site.

IV. ENDANGERMENT DETERMINATION

Given the conditions at the Quality Cleaners site, the nature of the suspected hazardous substances on site, and the potential exposure pathways described in Sections II and III above, actual or threatened releases of hazardous substances from this site, if not addressed by implementing the response actions selected in this Action Memorandum, present an imminent and substantial endangerment to public health, or welfare, or the environment.

V. PROPOSED ACTIONS AND ESTIMATED COSTS

The OSC proposes to undertake the following actions to mitigate threats posed by the presence of hazardous wastes at the Quality Cleaners Site:

1. Develop and implement a site specific Health and Safety Plan, including air monitoring and site contingency plan;
2. Develop and implement a site security plan;
3. Characterize, remove and properly dispose of hazardous waste and hazardous substances (including all small containers) in accordance with U.S. EPA's Off-Site Rule (40 C.F.R. § 300.400);
4. Remove, properly decommission and dispose of the underground storage tanks and the above ground storage tank;
5. Remove and properly dispose of contaminated soil around and below the tanks listed above. The extent of soil removal shall be in accordance to 35 IAC Part 742 (Illinois TACO rule);
6. Back fill the exposed hole with clean fill.

The OSC has initiated planning for provision of post-removal site control consistent with the provisions of Section 300.415(l) of the NCP. The nature of this removal action as well as the complete removal of all hazardous wastes from the site, will eliminate the need for any post-removal site control.

The estimated costs to complete the above activities are summarized below. These activities will require an estimated 8 working days to complete.

The detailed cleanup contractor cost estimate is presented in Attachment 1 and estimated project costs are summarized below:

REMOVAL PROJECT CEILING ESTIMATE

EXTRAMURAL COSTS:

Cleanup Contractor	\$15,117
Contingency (15%)	<u>2,267</u>
Subtotal	\$17,384
Total START	<u>3,000</u>
Extramural Subtotal	\$20,384
Extramural Contingency (20%)	<u>4,076</u>
TOTAL EXTRAMURAL COSTS	\$24,461

INTRAMURAL COSTS:

U.S. EPA Direct Costs \$30 X [(60 Regional Hours)+ 10 HQ Hours]	\$ 2,100
U.S. EPA Indirect Costs \$65 X (60 Regional Hours)	<u>3,900</u>
TOTAL INTRAMURAL COSTS	<u>6,000</u>
TOTAL REMOVAL PROJECT CEILING ESTIMATE	<u><u>\$30,461</u></u>

The response actions described in this memorandum directly address the actual or threatened release at the site of a hazardous substance, or of a pollutant, or of a contaminant which may pose an imminent and substantial endangerment to public health or welfare or to the environment. These response actions do not impose a burden on affected property disproportionate to the extent to which that property contributes to the conditions being addressed.

Applicable or Relevant and Appropriate Requirements

All applicable, relevant, and appropriate requirements (ARARs) will be complied with to the extent practicable. A letter was sent to Tom Miller of the IEPA on March 17, 1998, requesting that the IEPA identify State ARARs. Any State or Federal ARARs identified in a timely manner for this removal action will be complied with to the extent practicable.

All hazardous substances, pollutants or contaminants removed off site pursuant to this removal action for treatment, storage and disposal shall be treated, stored, or disposed of at a facility in compliance, as determined by U.S. EPA, with the U.S. EPA Off-site Rule, 40 C.F.R. § 300.440, 58 Federal Register 49215 (Sept. 22, 1993).

VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

Continued risk to public health and the environment will result if no action or delayed action ensues.

VII. OUTSTANDING POLICY ISSUES

None

VIII. ENFORCEMENT

For administrative purposes, information concerning the enforcement strategy for this site is contained in the Enforcement Confidential Addendum.

IX. RECOMMENDATION

This decision document represents the selected removal action for the Quality Cleaners site located in Belleville, St. Clair County, Illinois, developed in accordance with CERCLA as amended, and is not inconsistent with the NCP. This decision is based on the Administrative Record for the site. Conditions at the site meet the NCP Section 300.415(b)(2) criteria for a removal and I recommend your approval of the proposed removal action. The total project ceiling, if approved, will be \$30,461. Of this, an estimated \$24,461 may be used for cleanup contractor costs. You may indicate your decision by signing below.

APPROVE: _____

W. E. Myers
Director, Superfund Division

DATE: _____

5/28/99

DISAPPROVE: _____

Director, Superfund Division

DATE: _____

Figure 1. Site Location Map

Attachments:

- I. Detailed Cleanup Contractor Estimate
- II. Enforcement Confidential Addendum
- III. Administrative Record Index

cc: K. Mould, U.S. EPA HQ, 5202G

M. Chezik, U.S. Department of Interior, w/o Enf. Addendum

T. Miller, Illinois EPA, w/o Enf. Addendum

B. Everetts, Illinois EPA, w/o Enf. Addendum

BCC PAGE

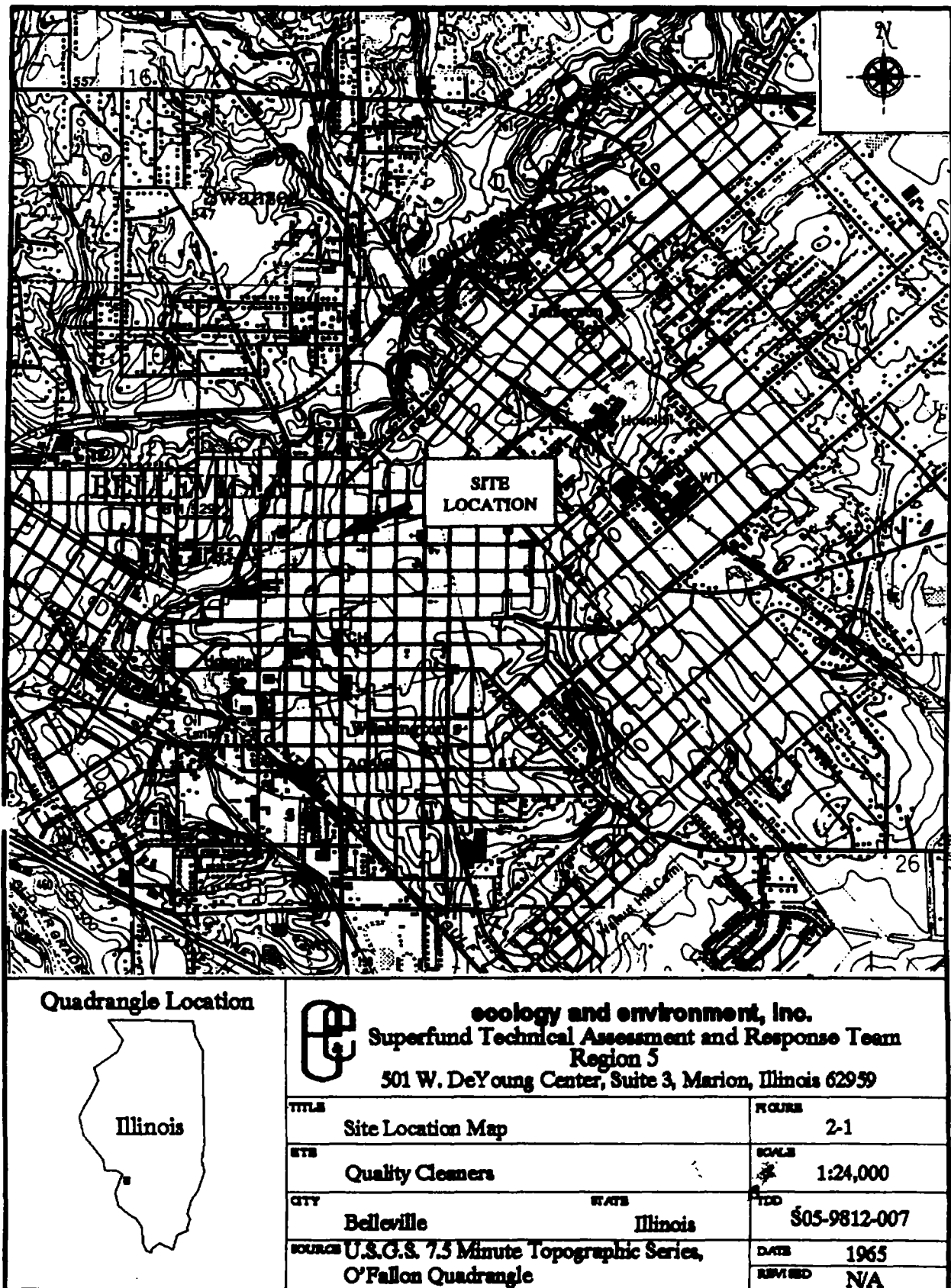
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NOT RELEVANT TO THE SELECTION OF REMOVAL ACTION

DETAILED CLEANUP CONTRACTOR ESTIMATE
(Attachment I)

FIGURE 1



QUALITY CLEANERS

CLIN BREAKOUT

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3 PAGES

NOT RELEVANT TO THE SELECTION OF REMOVAL ACTION

**QUALITY CLEANERS SITE
ENFORCEMENT ADDENDUM**

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NOT RELEVANT TO THE SELECTION OF REMOVAL ACTION

ATTACHMENT III

U.S. ENVIRONMENTAL PROTECTION AGENCY
REMOVAL ACTION

ADMINISTRATIVE RECORD
FOR
QUALITY CLEANERS SITE
BELLEVILLE, ST. CLAIR COUNTY, ILLINOIS

ORIGINAL
MAY 19, 1999

NO.	DATE	AUTHOR	RECIPIENT	TITLE/DESCRIPTION	PAGES
1	04/11/97	Angleton, D., Angleton Environmental	Service Tax Company	Letter re: AE's April 9, 1997 Sampling at the Quality Cleaners Site	2
2	11/23/98	Everetts, B., IEPA	Bolen, B., U.S. EPA	Letter re: IEPA's Request for the Assign- ment of an U.S. EPA On-Scene Coordinator for the Quality Cleaners Site	2
3	01/29/99	Jansen, S., U.S. EPA	Atkociunas, P., Ecology and Environment, Inc.	FAX Transmission re: Owner/Operator History for the Quality Cleaners Site w/ Attached 1994- 1995 Real Estate Tax Bills	3
4	02/22/99	Fitzgerald, T. & T. Kouris; Ecology and Environment, Inc.	Nabasny, G., U.S. EPA	Letter re: December 2, 1998 Site Reconnaissance at the Quality Cleaners Site	2
5	02/24/99	Ecology and Environment, Inc.	U.S. EPA	Site Assessment Report for the Quality Cleaners Site	48
6	04/05/99	Turner, K., U.S. EPA	Miller, T., IEPA	Letter re: U.S. EPA's Request for Illinois ARARs for the Quality Cleaners Site	1
7	00/00/00	Turner, K., U.S. EPA	Muno, W., U.S. EPA	Action Memorandum: Request for a Time- Critical Removal Action at the Quality Cleaners Site (PENDING)	